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April 3, 2015

Hon. J. Paul Oetken (via electronic filing)
United States District Judge
Southern District of New York
40 Foley Square, Room 2101
New York, N.Y. 10007

                    Re: Fulbrook Capital Management, et ano, Petitioners v. James
                        Batson, Respondent
                        Civ. Action No.: 14cv7564

Dear Judge Oetken,

I am the attorney for the Petitioners in the above referenced proceeding to vacate an American Arbitration Association arbitration award under Article 75 of the CPLR.

In a decision dated January 23, 2015, Your Honor rendered a decision which denied the petition and confirmed the award. On February 2, 2015, an Amended Judgment was entered granting Respondent a money judgment against Petitioners in the sum of $176,629.17.

Following the issuance of the Judgment, on March 17, 2015 Respondent served five subpoenas to the Petitioners and a subpoena and restraining order to a third party, the law firm of Latham & Watkin's, LLP. Following service of the subpoenas, the parties engaged in settlement discussions and during such discussions, counsel for Respondent agree to extend the time to respond or the move the quash the subpoena or seek a protective order to today.

The settlement discussions continued up to yesterday without the parties reaching a settlement. Mr. Brecher would not consent to any further extension on the grounds that Petitioner have had sufficient time to either comply with the subpoenas or move to quash the subpoenas or seek a protective order.

Accordingly, I respectfully request that Petitioners' time to either comply with the subpoenas or move to quash the subpoenas or seek a protective order be extended up to

and including April 9, 2015. This is the first time that an extension has been requested from the Court.

Thank you for your courtesy and consideration.

Respectfully,

Leonard Rodney

Leonard Rodney

LR/ms

CC: Ethan Brecher, Esq. (via electronic filing)
      Attorney for Respondent